

September 18, 2023

Via ECF

Hon. Denny Chin U.S. Court of Appeals for the Second Circuit Thurgood Marshall Courthouse 40 Foley Square New York, NY 10007

Re: Pitre v. City of New York, et al; 18-CV-5950 (DC)

Dear Judge Chin:

We represent the Plaintiff in the above-referenced matter. I write to request an extension of one-day for the currently pending 9/18/23 deadline to file Plaintiff's responses to Defendants' motions *in limine*. The newly requested deadline is tomorrow, 9/19/23.

The reason for this request is that Plaintiff's counsel is unable to finalize and submit the opposition to Defendants' motion because of an all-day in-person deposition at opposing counsel's offices in another case counsel is also handling today.

Therefore, Plaintiff asserts that there is good cause for Your Honor to grant this one-day extension.

Thank you for your consideration and attention in this matter.

Respectfully submitted,

DEREK SMITH LAW GROUP, PLLC

Attorneys for Claimant

Seamus P. Barrett, Esq. 1 Penn Plaza; Suite 4905 New York, NY 10119

(332) 910-5681

CC: to all parties via ECF